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Attorney for Debtor.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In Re:
MICHAEL ALAN GIBBS,

Debtor.

Chapter 13 Proceedings

Case No: 4:16-bk-08178- BMW

**MOTION TO EXTEND THE DEADLINE
TO SUBMIT THE PROPOSED
STIPULATED ORDER CONFIRMING
FOURTH AMENDED CHAPTER 13
PLAN TO THE TRUSTEE**

COMES NOW the Debtor by and through undersigned counsel and hereby request an extension to allow the filing of the proposed Stipulated Order Confirming Fourth Amended Chapter 13 Case.

1. The Debtor filed a Chapter 13 bankruptcy on July 18, 2016.
2. Debtor needs additional time to comply with trustee's requests and to resolve the objection of Grasky Endurance Coaching, LLC dba Tucson Endurance Performance Center.
3. Once the issue with the objection of Grasky Endurance Coaching, LLC dba Tucson Endurance Performance Center has been resolved, Debtor can submit the proposed Stipulated Order Confirming the Fourth Amended Chapter 13 Plan to the trustee.
4. As there issues remain outstanding, Debtor requests additional time to accommodate the time necessary to submit a proposed Stipulated Order Confirming the Fourth Amended Chapter 13 Plan.

WHEREFORE, the Debtor asks the Court to extend the deadline to submit the Proposed Stipulated Order Confirming the Fourth Amended Chapter 13 Plan to November 20, 2018.

Dated: September 24, 2018

Law Offices of Matthew Foley, PLC

By: /s/ MTF, (023212)

MATTHEW T. FOLEY, Esq. #023212

Attorney for Debtor

1 I hereby certify that on September 24, 2018, I have served a copy of this Notice and all
2 attachments to the following by electronic mail to:

3 Dianne C. Kerns, Ch. 13 Trustee. mail@dcktrustee.com
4 Office of the U.S. Trustee, 230 N. USTPregion14.pxECF@USToj.gov

5 By: /s/ JDL
6 Jennifer D. Linden, Paralegal
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